

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**INGE GOODSON,**

*Plaintiff,*

**v.**

**BANK OF AMERICA, N.A.,**

*Defendant.*

**Case No. 1:12-cv-00065**

**BANK OF AMERICA, N.A.'S RESPONSE TO PLAINTIFF'S MOTION TO  
RESCHEDULE TRIAL**

Defendant Bank of America, N.A. ("BANA" or "Defendant"), by its undersigned attorney, respectfully submits this Response to Plaintiff's Motion to Reschedule Trial ("Motion") [Doc. 49].

If the trial date cannot remain January 21, 2014, Defendant respectfully submits that as set forth in *Goodson v. Shapiro & Kirsch*, Case No. 1:11-cv-31, ("Shapiro Case") Plaintiff did not oppose Shapiro & Kirsch's ("Shapiro") motion to continue the trial until after BANA's trial (Case No. 1:11-cv-31, Doc. # 102) and then consented to a second motion to continue that trial in the *Shapiro* Case until after trial in the case at bar ("*BANA* case") (Case No. 1:11-cv-31, Doc. # 120, 121). However, Plaintiff now submits to the Court that the BANA trial date should come after the Shapiro case as it would be more streamlined. (*See* Doc. # 49, ¶¶ 3, 4). Defendant would submit to the Court that in light of the anticipated motion from Shapiro and in the interest of judicial resources that the BANA Case be set for trial prior to the Shapiro Case. Further, again plaintiff's counsel requests that the cases be consolidated which has previously been denied. If the Court deems the motion as one to consolidate, Defendant submits that the prior ruling on this matter should not be disturbed.

This is the 3rd day of January, 2014.

Respectfully submitted,

s/ Lauren Paxton Roberts

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### **CERTIFICATE OF SERVICE**

I do hereby certify that true and exact copies of the foregoing **Response to Plaintiff's Motion to Reschedule Trial** has this day been filed with the Clerk of the Court using the CM/ECF system which sent notice of filing to parties listed and mailed a true copy of same via prepaid First Class mail and/or electronic mail to:

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Dated this 3rd day of January, 2014.

s/ Lauren Paxton Roberts  
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